

The provisions of United States District Court Rule 37.1 have been complied with.

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>THE WOLFINGTON GROUP,</b>	)	<b>CIVIL ACTION NO. 05-30202-MAP</b>
	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>V.</b>	)	
	)	
<b>BERTERA CHEVROLET, PONTIAC,</b>	)	
<b>BUICK, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**DEFENDANT, BERTERA CHEVROLET, PONTIAC, BUICK, INC.’S MOTION TO  
COMPEL THE PLAINTIFF TO COMPLETELY ANSWER INTERROGATORIES  
NUMBER 2(b-f), 4, 5, 7, 8, 12, 14 AND COMPLETELY RESPOND TO DOCUMENT  
PRODUCTION REQUESTS NUMBER 1(a), 1(b), 1(e), 1(f), 3, 6, AND 7**

NOW COMES, the Defendant, Bertera Chevrolet, Pontiac, Buick, Inc. (“Bertera”), and hereby moves, pursuant to F.R.C.P. 37(a) (2), for an order compelling the Plaintiff to completely answer Bertera’s Interrogatories Nos. 2(b-f), 4, 5, 7, 8, 12 and 14 and completely respond to Bertera’s Document Production Requests Nos. 1(a), 1(b), 1(e), 1(f), 3, 6 and 7 within ten days of this Court’s order on this motion. As grounds in support hereof, Bertera hereby incorporates by reference the attached Memorandum of Law as if expressly re-written herein.

WHEREFORE, the Defendant, Bertera Chevrolet, Pontiac, Buick, Inc. moves for an Order compelling the Plaintiff, the Wolfington Group to completely answer Defendant’s Interrogatories Nos. 2(b-f), 4, 5, 7, 8, 12 and 14 and completely respond to Defendant’s Document Production Requests Nos. 1(a), 1(b), 1(e), 1(f), 3, 6 and 7 within ten days of this Court’s order, plus any other relief that is just and equitable under the circumstances.

The provisions of United States District Court Rule 37.1 have been complied with.

**BERTERA CHEVROLET, PONTIAC,  
BUICK, INC.**

By its attorney,

s/John A. Kiernan

John A. Kiernan, (BBO No. 271020)

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